

BELLSOUTH
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May 6, 1998

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FEDERAL COMMUNICATIONS
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

Re: CC Docket No. 97-208, CC Docket No. 97-231 ✓
CC Docket No. 97-121, CC Docket No. 97-137,
CC Docket No. 96-98, CC Docket No. 98-56; and RM-9101

Dear Ms. Salas:

This is to inform you that Sid Boren, Randy New, Allan Price, Jim Llewellyn, Robert Blau, and the undersigned, all of BellSouth Corporation, and Erwin Krasnow of Verner, Lipfert, Bernhard, McPherson & Hand, met with Commission staff on May 5, 1998. The following Common Carrier Bureau staff members attended some or all of this meeting: Bill Agee, Bill Bailey; Claudia Fox; Jordan Goldstein; Jake Jennings; Michael Kende; David Kirschner; Carol Matthey; Melissa Newman; Liz Nightingale; Michael Pryor; Katherine Schroder; Joe Welch; and Audrey Wright.

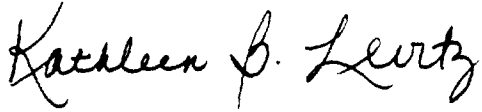
During the meeting the participants discussed issues related to the showings required to demonstrate that an applicant for 271 relief has complied with the requirements of Section 271 (c)(1)(A) and of Section 271 (c)(2)(B)(v) of the Communications Act of 1934, as amended. We also discussed the MCI ex partes of April 28, 1998 and April 30, 1998.

Attachment 1 is a copy of a document prepared in response to an earlier Commission staff request. Representatives of BellSouth explained and gave copies of this document to Commission staff at the meeting.

Because the Commission is considering one or more of the issues discussed at the meeting in each of the proceedings identified above, we are filing notice of this ex parte meeting in each of those proceedings.

As required by Section 1.1206(a)(2) of the Commission's rules, we are filing with the Commission two copies of this notice in each of the proceedings identified above. Please associate this notification with each of those proceedings.

Sincerely,

A handwritten signature in black ink, reading "Kathleen B. Levitz". The signature is written in a cursive style with a large, stylized "K" and "L".

Kathleen B. Levitz
Vice President-Federal Regulatory

Attachment

cc:	Bill Agee	Bill Bailey	Claudia Fox
	Jordan Goldstein	Jake Jennings	Michael Kende
	David Kirschner	Carol Matthey	Melissa Newman
	Liz Nightingale	Michael Pryor	Katherine Schroder
	Joe Welch	Audrey Wright	

Attachment 1

What follows are interim responses to questions related to performance measurements that arose in the recent BST meetings with the FCC. We shall provide you with further updates as they become available

1. Question/Request

List the UNEs that fall into Design and Non-Design categories.

Response:

In the table below is our current reference information for elements meeting the design or non-design request. Other unbundled issues are not addressed here and they include: "Database Services" (i.e. Line Information Database, 800 Access Screening Service), and/or "Contracted Services" (i.e. Directory Assistance, Collocation).

<u>DESIGNED</u>	<u>NON-DESIGNED</u>
UAL Unbundled ADSL Loop	UEANL Unbundled Voice Loop
UAL2 Unbundled ADSL Loop two-wire	UEPRX Unbundled Exchange Port Residence
UDF Unbundled Dark Fiber	UEPBX Unbundled Exchange Port Business
UDL Unbundled Digital Loop	UEPPX Unbundled Exchange Port PBX Trunk
UDL19 Unbundled Digital Loop 19.2Kbps	UEAMC Unbundled Voice Loop
UDL2X Unbundled Digital Loop 2.4 Kbps	USBN2 Two-Wire Unbundled Sub-Loop
UDL4X Unbundled Digital Loop 4.8 Kbps	USBN4 Four-Wire Unbundled Sub-Loop
UDL56 Unbundled Digital Loop 56 Kbps	
UDL64 Unbundled Digital Loop 64 Kbps	
UDL9X Unbundled Digital Loop 9.6 Kbps	
UDN Unbundled Two-Wire ISDN Loop	
UEA Unbundled Exchange Access Loop	
UE3 Unbundled Digital Loop DS3	
UE3PX Unbundled Digital Loop DS2	
UHL Unbundled HDSL Loop	
USBD2 Unbundled Sub-Loops for ALECS	
USB1B Unbundled Sub-Loops for ALECS, BRI, ISDN	
USL Unbundled DS1 Loop	
U112X Unbundled ISDN, BRI, Loop	

2. Question/Request

Can we produce the "raw" numbers for BST/CLECS used to compile the Georgia 3-31-98 SQM reports?

Response:

BST cannot provide the actual or "raw" numbers used for the 3-31 SQM reports. The original database queries used to generate these data were primarily written to produce end-results, rather than integral parts of the calculations (i.e. numerator / denominator). Additionally, we advise against a rerun of the February time period since several of the underlying data sources are a "snapshot" of the activity and/or are overwritten with subsequent information. The actual or raw numbers will be available for use by the regulators beginning with the April report month.

3. Question/Request

Describe what will be required to produce a "Call Completion" measurement rather than the current trunk blocking measurement(s).

Response:

BST is investigating this issue and will provide an analysis of its feasibility as soon as possible.

4. Question/Request

Compare the FCC-NPRM to BST's SQM.

Response:

Please see the attached Exhibit "WNS-2" for a comparison of the NPRM and SQM measurements.

5. Question/Request

Provide a response to the suggested NPRM-methods to evaluate/compare parity.

Response:

BST will review the NPRM-proposed statistical parity methodology and produce a written response as soon as possible.

Comparison Matrix
FCC Proposed Rule Making vs. BellSouth Service Quality Measurements

FCC Proposed Rule Making Measurements		BellSouth Service Quality Measurements	
Measurement	Formula	Measurement	Formula
Average Response Time	$\Sigma (\text{Query Response Date \& Time}) - \text{Query Submissions Date \& Time} / \text{Number of Queries submitted in Reporting Period}$	Average Response Interval	$\Sigma (\text{Date \& Time of Legacy Response}) - (\text{Date \& Time of Request to Legacy}) / \text{Number of Legacy Request during Reporting Period}$
Average Completion Interval	$\Sigma (\text{Completion Date \& Time}) - (\text{Order Submission Date \& Time}) / \text{Total Number of Orders Completed in Reporting Period}$	Average Completion Interval	$\Sigma (\text{Completion Date \& Time}) - (\text{Order Issue Date \& Time}) / \text{Count of orders completed in Reporting Period}$
% of Due Dates Missed	$\text{Number of Orders Not Completed w/ ILEC Committed Due Date \& Time in Reporting Period} / \text{Total Number of Orders Scheduled for Completion} \times 100$	% Missed Installation Appointments	$\Sigma (\text{Number of Orders missed in Reporting Period}) / (\text{Number of Orders completed in Reporting Period}) \times 100$
Average Coordinated Customer Conversion Interval	$\Sigma (\text{Completion Date \& Time for Cross Connection of an Unbundled Loop}) - (\text{Disconnection Date and Time of an Unbundled Loop}) / \text{Total Number of Unbundled Loop Orders for Reporting Period}$	See Note 1	
Average Reject Notice Interval	$\Sigma (\text{Date \& Time of Order Rejection}) - (\text{Date \& Time of Receipt of Order}) / \text{Number of Orders Rejected for Reporting Period}$	Reject Interval	$\Sigma (\text{Date \& Time of Service Request Rejection}) - (\text{Date \& Time of Service Request Acknowledgment}) / \text{Number of Service Requests Rejected in Reporting Period}$
Average FOC Notice Interval	$\Sigma (\text{Date \& Time of FOC}) - (\text{Date \& Time of Receipt of valid Order}) / \text{Number of Orders Confirmed in Reporting Period}$	Firm Order Confirmation Timeliness	$\Sigma (\text{Date \& Time of FOC}) - (\text{Date \& Time of Service Request Acknowledgment}) / \text{Number of Service Requests confirmed in Reporting Period}$
		Total Service Request Cycle Time	$\Sigma (\text{Date \& Time CLEC Service Request placed in queue for completion}) - (\text{Date \& Time Service Request first reaches BST interface}) / \text{Total number of Service Requests}$
Average Jeopardy Notice Interval	$\Sigma (\text{Date \& Time of scheduled due date on FOC}) - (\text{Date \& Time of Jeopardy Notice}) / \text{Number of orders in jeopardy for Reporting Period}$	See Note 1	
% of Orders given Jeopardy Notice	$\text{Number of Orders given Jeopardy Notices} / \text{Number of Orders Confirmed in Reporting Period}$	See Note 1	
Average Completion Notice Interval	$\Sigma (\text{Date \& Time of Notice of Completion}) - (\text{Date \& Time of Completion of Work}) / \text{Number of Orders Completed in Reporting Period}$	Order Completion Interval Distribution	$\Sigma (\text{Service Orders completed in "X" days}) / (\text{Total Service Orders completed in Reporting Period}) \times 100$
Average Interval for Held Orders	$\Sigma (\text{Reporting Period Close Date}) - (\text{Completion Date on FOC}) / (\text{Number of Held Orders for Reporting Period})$	Mean Held Order Interval	$\Sigma (\text{Reporting Period Close Date}) - (\text{Committed Order Due Date}) / \text{Number of Orders Pending and Past the committed due date}$
		% Order Accuracy	$\Sigma (\text{Orders completed without error}) / (\text{Orders Completed}) \times 100$

Comparison Matrix
FCC Proposed Rule Making vs. BellSouth Service Quality Measurements

FCC Proposed Rule Making Measurements		BellSouth Service Quality Measurements	
Measurement	Formula	Measurement	Formula
% Troubles w/ 30 days of install	$(\text{New Service Orders Receiving Trouble Reports} \leq 30 \text{ days of Order Completion}) / (\text{Number of New Service Orders Completed in Month}) \times 100$	% Provisioning Troubles w/ 30 days of installation	$\sum (\text{All Troubles on Services installed} \leq 30 \text{ days in a calendar month}) / (\text{All installations in same calendar month}) \times 100$
% Order Flow Through	$(\text{Number of Orders Electronically Processed through the Gateway and Accepted into the ILEC Legacy Systems w/o Manual Intervention}) / (\text{Number of Orders Submitted in Reporting Period}) \times 100$	% Flow Through Service Requests	$\sum (\text{Total of Service Requests that flow through to the BST OSS}) / (\text{Total Number of Service Requests delivered to BST OSS}) \times 100$
% Rejected Orders	$(\text{Number of Orders Rejected Due to Error or Omission}) / (\text{Number of Orders Submitted in Reporting Period}) \times 100$	% Rejected Service Requests	$\sum (\text{Total Number of Rejected Service Requests}) / (\text{Total Number Service Requests Received}) \times 100$
Average Submissions per Order	$\sum (\text{Number of Orders accepted for Provisioning}) - (\text{Number of Orders Rejected}) / \text{Number of Orders Accepted for Provisioning in Reporting Period}$	Service Request Submissions per Request	$\sum (\text{Total Service Requests that flow through to the BST OSS}) + (\text{Total Rejects}) / \text{Total Service Requests Received}$
% of 911/E911 Database Updates	$(\text{Number of Database Updates Completed w/o Error}) / (\text{Total Number of Updates Completed}) \times 100$	E911 Accuracy	$\sum (\text{Total Number of SOIR orders for E911 updates}) - (\text{Total number of Service Order Interface Records (SOIRs) with errors generated from Daily TN activity}) / \text{Total number of SOIR orders for E911 updates} \times 100$
% Missed Due Dates for 911/E911	$(\text{Number of Updates Completed by Committed Due Date During Reporting Period}) / (\text{Total Number of updates scheduled to be completed}) \times 100$	E911 Timeliness	$\sum (\text{Number of Confirmed Orders}) - (\text{Number of Orders missed in Reporting Period}) / (\text{Number of Orders Confirmed in Reporting Period}) \times 100$
		% Out of Service > 24 Hours	$(\text{Total Troubles} > 24 \text{ hours}) / (\text{Total Troubles}) \times 100$
Average Time to Restore	$\sum (\text{Date \& Time Trouble Ticket Resolution Notification Returned to CLEC}) - (\text{Date \& Time Trouble Ticket Logged with ILEC}) / \text{Number of Trouble Tickets Resolved in Reporting Period}$	Maintenance Average Duration	$(\text{Total Duration Time}) / (\text{Total Troubles})$
Frequency of Troubles w/ 30 days	$(\text{Number of Trouble Tickets received in 30-day period}) / (\text{Number of Service Access Lines in Service at end of Reporting Period}) \times 100$	% Repeat Troubles within 30 days	$(\text{Total Repeated Trouble Reports within 30 days}) / (\text{Total Troubles}) \times 100$
Frequency of Repeat Troubles	$(\text{Total Number of Repeat Trouble Reports}) / (\text{Total Number of Trouble Tickets received in 30-day period}) \times 100$	Customer Trouble Report Rate	$(\text{Count of Initial and Repeated Trouble Reports in the Current Period}) / (\text{Number of Service Access Lines in service at end of reporting period}) \times 100$
% Customer Troubles Resolved w/ estimate	$(\text{Number of Trouble Tickets Resolved by Estimated Date \& Time}) / (\text{Number of Trouble Tickets Resolved w/ Reporting Period}) \times 100$	% of Missed Repair Appointments	$\sum (\text{Customer Troubles not resolved by the Quoted Resolution Date \& Time}) / (\text{Customer Trouble Tickets Closed}) \times 100$
Average Time to Provide Usage Records	$\sum (\text{Date \& Time Usage Records Transmitted}) - (\text{Date \& Time Usage Records Recorded}) / \text{Number of Usage Records Transmitted in Reporting Period}$	Usage Data Delivery Timeliness	$(\text{Total number of usage records sent within 6 calendar days from initial recording/receipt}) / (\text{Total number of usage records sent})$
		Usage Data Delivery Accuracy	$\sum (\text{Total number of usage data packs sent during current month}) - (\text{Total number of usage data packs requiring retransmission during current month}) / \text{Total number of usage data packs sent during current month}$

Comparison Matrix
FCC Proposed Rule Making vs. BellSouth Service Quality Measurements

FCC Proposed Rule Making Measurements		BellSouth Service Quality Measurements	
<i>Measurement</i>	<i>Formula</i>	<i>Measurement</i>	<i>Formula</i>
		Usage Data Delivery Completeness	(Total number of Recorded usage records delivered during the current month that are within 30 days of the message create date) / (Total number of Recorded usage records delivered during the current month)
Average Time to Deliver Invoices	$\Sigma (\text{Date \& Time Invoices Transmitted}) - (\text{Date \& Time Bill Cycle Closes}) / \text{Number of Invoices Produced Electronically during Reporting Period}$	Invoice Timeliness	(Total number of billing invoices released in the current month) - (Number of billing invoices released within target number of days after the Bill Date) / Total number of billing invoices released in the current month) X 100
		Invoice Accuracy	(Total Local Services Billed Revenues during current month) - (Total Adjustment Revenues during current month) X 100
% of Time OSS Interface Available	(Number of Hours OSS Functionality is Available to CLEC during Reporting Period) / (Number of Hours OSS Functionality was scheduled to be available) X 100	OSS Interface Availability	(Actual Availability to CLEC) / (Scheduled Availability to CLEC) X 100
		Maintenance OSS Response Interval	Access Times in increments of ≈ 4 secs, ≈ 4 and ≈ 10 secs, ≈ 10 secs and ≈ 30 secs.
		Maintenance OSS Interface Availability	(Actual Availability) / (Scheduled Availability) X 100
		Average Answer Time - Repair Centers (UNE, RRC & BRC)	(Total Time in seconds for center response) / (Total number of calls in reporting period)
Average Time to Answer Calls (CLEC ctr)	$\Sigma (\text{Date \& Time of call answered}) - (\text{Date \& Time of Call Receipt}) / \text{Total calls answered by center}$	Speed of Answer in Ordering Center	$\Sigma (\text{Total Time in seconds to reach LCSC}) / (\text{Total number of calls in Reporting Period})$
Average Time to Answer Calls (OS/DA)	$\Sigma (\text{Date \& Time of Response from ILEC OS/DA database operator}) - (\text{Date \& Time of call to ILEC OS/DA database operator}) / \text{Total Number of Calls to ILEC OS/DA}$	Average Speed to Answer (OS/DA)	$\Sigma (\text{Total call waiting seconds}) / (\text{Total Calls Served})$
		% Answered within "X" seconds (OS/DA)	Derived by converting the Average Speed to Answer using Bellcore Statistical Answer Conversion Tables, to arrive at a % of calls answered in less than "X" seconds
% Blockage on Interconnection Trunks	(Final Interconnection Trunk Groups Blocked during Reporting Period) / (Total number of Interconnection Trunk Groups)	Trunk Group Service Report	Specifically measures total number of trunk groups, number of trunk groups measured, and the number of trunk groups with blocking factors exceeding the blocking threshold in one or more 1 hour measurement intervals during the report month
% Blockage on Common Trunks	(Final Common Trunk Groups Blocked during Reporting Period) / (Total number of Common Trunk Groups)	Trunk Group Service Report	Specifically measures total number of trunk groups, number of trunk groups measured, and the number of trunk groups with blocking factors exceeding the blocking threshold in one or more 1 hour measurement intervals during the report month

Comparison Matrix
FCC Proposed Rule Making vs. BellSouth Service Quality Measurements

FCC Proposed Rule Making Measurements		BellSouth Service Quality Measurements	
<i>Measurement</i>	<i>Formula</i>	<i>Measurement</i>	<i>Formula</i>
		Comparative Trunk Group Service Summary	Comparative measurements of number of trunk groups exceeding threshold
		Trunk Group Service Detail	Detail listing of all final trunk groups including actual blocking performance Measured blocking = (Total Number of Blocked Calls) / (Total Number of Attempted Calls) X 100
Average Time to Respond to Collocation Request	Σ (Request Response Date & Time) - (Request Submission Date & Time) / Count of Requests submitted in Reporting Period	See Note 2	
Average Time to Provide Collocation Arrangement	Σ (Date & Time Collocation Arrangement is Complete) - (Date and Time Order for Collocation Arrangement submitted) / Total Number of Collocation Arrangements Completed during Reporting Period	See Note 2	
% of Due Dates Missed with Respect to the Provision of Collocation Arrangements	(Number of Orders not completed w/ ILEC committed Due Date during reporting period) / (Number of Orders scheduled for completion in reporting period) X 100	See Note 2	

Note 1: BellSouth is currently in the process of developing this measurement and is committed to adding this measurement to the Service Quality Measurements later this year.

Note 2: BellSouth can and will manually produce these measurements on demand at this time and will have them automated by the end of 1998.